UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

AKANIYENE WILLIAM ETUK	_
Write the full name of each plaintiff.	CV (Include case number if one has been assigned)
NEW YORK CITY POLICE DEPARMENT,	COMPLAINT Plant Do you want a jury trial? Do Yes Do No
Write the full name of each defendant. If you need more space, please write "see attached" in the space above and attach an additional sheet of paper with the full list of names. The names listed above must be identical to those contained in Section II.	
	r-3 (4)

NOTICE

The public can access electronic court files. For privacy and security reasons, papers filed with the court should therefore *not* contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include *only*: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number. See Federal Rule of Civil Procedure 5.2.

I. BASIS FOR JURISDICTION

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation, and the amount in controversy is more than \$75,000, is a diversity case. In a diversity case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal-court jurisdiction in your case?
Federal Question
☐ Diversity of Citizenship
A. If you checked Federal Question
Which of your federal constitutional or federal statutory rights have been violated?
VIOLATION OF THE RIGHT TO TRAVEL, VIOLATION OF RIGHT TO
PRIVACY . UNANTHORISES LEGAL DETERMINATIONS, FAILURE TO
DENTIFY AS POLICE DEFICERS, EXCESSIVE FORLL, UNLANFUL
TRANSPORT AND PROCESSING, VIOLATION OF ADA, VIOLATION OF DATH TO WE TI
MOLATION OF THE RIGHT TO TRAVEL, VIOLATION OF RIGHT TO PRIVACY UNANTHORISES LEGAL DETERMINATIONS, FAILURE TO DENTIFY AS POLICE DEFICERS, EXCESSIVE FORLE, UNIANTIUL TRANSPORT AND PROCESSING, VIOLATION OF DATH TO WE THE B. If you checked Diversity of Citizenship Prople. IMPERSONATION AS LEGITIMATE PROLEGY 1. Citizenship of the parties CORPORATION SY FORGERN
1. Citizenship of the parties EmPloyment By Folgign
Of what State is each party a citizen? CORPORATION .
The plaintiff,, is a citizen of the State of
(Plaintiff's name)
(State in which the person resides and intends to remain.)
or, if not lawfully admitted for permanent residence in the United States, a citizen or subject of the foreign state of
·
If more than one plaintiff is named in the complaint, attach additional pages providing information for each additional plaintiff.

If the defendant is an inc	dividual:	
The defendant,(Defer	ndant's name)	, is a citizen of the State of
or, if not lawfully admi subject of the foreign st	-	e in the United States, a citizen or
If the defendant is a corp	poration:	·
The defendant,	<u>.</u>	, is incorporated under the laws of
the State of		
		f
	r the laws of (foreign state)	
and has its principal pla	ice of business in	
	nt is named in the complaint, a	attach additional pages providing
II. PARTIES		
A. Plaintiff Information	on	
Provide the following informages if needed.	rmation for each plaintiff nan	ned in the complaint. Attach additional
AKANIYENE	w E	TUK
First Name	Middle Initial La	st Name
24D4 ATLAN	TIC AVENUE	#04
2404 ATLAN Street Address		
BROOKLYN	NY	//233
County, City	State	Zip Code
	16-0970 av	vetuk 00 1@gmanl. Com
Telenhone Numhès	Email Add	ress (if available)

B. Defendant Information

To the best of your ability, provide addresses where each defendant may be served. If the correct information is not provided, it could delay or prevent service of the complaint on the defendant. Make sure that the defendants listed below are the same as those listed in the caption. Attach additional pages if needed.

Defendant 1:	NEW YOR	K CITY POLICE	DEPT, et al.		
	First Name	Last Name			
	_ '	other identifying information)			
		s (or other address where defer	ndant may be served) ノレの名と		
1	County, City	State	Zip Code		
Defendant 2:	OFFICER 1	FRIAS # 809:	52		
	First Name	Last Name			
	Current Job Title (or o	ther identifying information)	-		
		s (or other address where defen	idant may be served)		
	BROW	NY	1045/		
	County, City	State	Zip Code		
Defendant 3:					
	First Name	Last Name			
	Current Job Title (or other identifying information)				
	Current Work Address (or other address where defendant may be served)				
	County, City	State	Zip Code		

Defendant 4:						
	First Name	Last Na	ame			
	Current Joh Title	or other identifying	information\			
	Current 10D Tide	(or other identifying	mormation			
	Current Work Address (or other address where defendant may be served)					
	County, City		State	Zip Code		
III. STATEMEN	NT OF CLAIM					
Place(s) of occurre	ence:					
Date(s) of occurre	nce:	the same of the sa		<u> </u>		
FACTS:						
harmed, and wha additional pages i	t each defendant _l	oersonally did or fai		nappened, how you were t harmed you. Attach		
				<u> </u>		
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			<u> </u>			
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	<u>. </u>					
				 		

United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007
Akaniyene William Etuk
2402 Atlantic Avenue
Brooklyn, New York, 11233
awetuk001@gmail.com
1(818) 485-9411 / 1(929) 676-0970
Pro Se Plaintiff
UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK
Akaniyene William Etuk,
Plaintiff,
v
New York City Police Department, et al.,
Defendants.
Case No.:
COMPLAINT



Introduction

1. This is a civil rights action brought by Plaintiff, Akaniyene William Etuk, against officers of the New York City Police Department ("NYPD") for violations of Plaintiff's constitutional rights, including the right to travel, the right to privacy, protection against unreasonable searches and seizures, and violations of the Americans with Disabilities Act ("ADA").

Jurisdiction and Venue

- 2. This Court has jurisdiction over this action under 28 U.S.C. § 1331 (federal question jurisdiction) and 42 U.S.C. § 1983 (civil action for deprivation of rights).
- 3. Venue is proper in the Southern District of New York under 28 U.S.C. § 1391(b) because the events giving rise to this claim occurred in this district.

Parties

- 4. Plaintiff, Akaniyene William Etuk, is a resident of Brooklyn, New York who was at the time of incident residing in the Bronx, New York.
- Defendant, New York City Police Department, is a municipal agency located at 1 Police Plaza, New York, NY 10038.
- 6. Defendant Officer Frias, shield number 30952, is an officer of the NYPD involved in the events described herein.

Facts

officers stopped Plaintiff on a train platform without Plaintiff's permission, contractual

- agreement, or being a crime victim.
- 8. Plaintiff was accompanied by a registered service animal providing essential services at the time of the stop. The service animal was registered and vaccinated at the time, and a copy of the service animal registration and vaccination papers are attached as Exhibits B and C, respectively.
- Officers of the NYPD stopped Plaintiff without a contract, thereby violating Plaintiff's right to travel.
- 10. Officers of the NYPD, without a contract, forced Plaintiff to identify himself, violating Plaintiff's right to privacy.
- 11. Officers of the NYPD made legal determinations without possessing a license to practice law.
- 12. Officers of the NYPD did not show their identification cards to verify themselves as registered policemen.
- 13. Officers of the NYPD approached Plaintiff with guns, under threat, duress, and coercion, attempting to force Plaintiff to sign an offer of contract (CJTN 70425074/NYSID 16037193M, which was registered and dismissed in court under case #B23637196). A copy of the dismissal certificate is attached as Exhibit A.
- 14. Officers of the NYPD used excessive force, causing pain and injury, before placing Plaintiff in handcuffs.

- 15. Officers of the NYPD transported Plaintiff to a different location from his intended point of travel, where Plaintiff's prints were taken without his consent or contractual agreement.
- 16. Defendants' actions in stopping and arresting Plaintiff and his registered service animal, who was providing essential services at the time, constituted discrimination under the Americans with Disabilities Act (ADA).
- 17. There is no evidence that these officers signed an oath to "We the People."
- 18. There is no evidence that these officers are legitimate police or policy enforcers for the original republic.
- 19. There is no evidence that these officers are not working for a foreign corporation.

Claims for Relief

Count I: Violation of the Right to Travel

- 20. Plaintiff incorporates by reference the allegations set forth in paragraphs 1-19 as though fully set forth herein.
 - 21. Defendants' actions on August 30, 2023, violated Plaintiff's right to travel freely within the United States.

Count II: Violation of the Right to Privacy

- 22. Plaintiff incorporates by reference the allegations set forth in paragraphs 1-19 as though fully set forth herein.
 - 23. Defendants' actions in forcing Plaintiff to identify himself without justification violated Plaintiff's right to privacy.

Count III: Unauthorized Legal Determinations

- 24. Plaintiff incorporates by reference the allegations set forth in paragraphs 1-19 as though fully set forth herein.
 - 25. Defendants made legal determinations without possessing a license to practice law.

Count IV: Failure to Identify as Police Officers

- 26. Plaintiff incorporates by reference the allegations set forth in paragraphs 1-19 as though fully set forth herein.
 - 27. Defendants did not show their identification cards to verify themselves as registered policemen.

Count V: Excessive Force

- 28. Plaintiff incorporates by reference the allegations set forth in paragraphs 1-19 as though fully set forth herein.
 - 29. Defendants used excessive force against Plaintiff, causing pain and injury, before placing Plaintiff in handcuffs.

Count VI: Unlawful Transport and Processing

- 30. Plaintiff incorporates by reference the allegations set forth in paragraphs 1-19 as though fully set forth herein.
 - 31. Defendants transported Plaintiff to a different location and processed Plaintiff's prints without his consent or contractual agreement.

Count VII: Violation of ADA

- 32. Plaintiff incorporates by reference the allegations set forth in paragraphs 1-19 as though fully set forth herein.
 - 33. Defendants violated the Americans with Disabilities Act (ADA) by stopping and arresting Plaintiff and his registered service animal, who was providing essential services at the time.

Count VIII: Violation of Oath to "We the People"

- 34. Plaintiff incorporates by reference the allegations set forth in paragraphs 1-19 as though fully set forth herein.
 - 35. Defendants did not sign an oath to "We the People," as required.

Count IX: Impersonation as Legitimate Police

- 36. Plaintiff incorporates by reference the allegations set forth in paragraphs 1-19 as though fully set forth herein.
 - 37. Defendants are not legitimate police or policy enforcers for the original republic.

Count X: Employment by a Foreign Corporation

- 38. Plaintiff incorporates by reference the allegations set forth in paragraphs 1-19 as though fully set forth herein.
 - 39. Defendants are working for a foreign corporation.

Prayer for Relief

WHEREFORE, Plaintiff respectfully requests that this Court enter judgment in his favor and against Defendants, and award Plaintiff:

- A. One million dollars (\$1,000,000.00) for each violation of Plaintiff's constitutional rights, ADA violations, and other legal standards;
- B. One million dollars (\$1,000,000.00) for each violation involving Plaintiff's service animal;
- C. Punitive damages in an amount to be determined at trial;
- D. Declaratory relief stating that Defendants' actions violated Plaintiff's constitutional rights, ADA, and other legal standards;
- E. Injunctive relief preventing Defendants from engaging in similar conduct in the future;
- F. Reasonable attorney's fees and costs of this action;
- G. Such other and further relief as the Court deems just and proper.

Judge Demand

Plaintiff demands a trial by a judge on all issues so triable.

Exhibits

- Exhibit A: Copy of Dismissal Certificate
- Exhibit B: Copy of Service Animal Registration
- Exhibit C: Copy of Service Animal Vaccination Papers

Dated: 16,24, 2024

Respectfully submitted

Akaniyene William Etuk

Plaintiff, Pro Se

2402 Atlantic Avenue

Brooklyn, New York, 11233

awetuk001@gmail.com

1(818) 485-9411 / 1(929) 676-0970



Reunification Form

326 East 110th Street New York NY 10029 212-788-4000

Agent / Owner's Details

Person ID: 138876 Receipt #: 249314 Receipt Date: 7/12/2023

Person Name:

Akaninyene Eink

Person Address:

1923 Mc donald Avenue APT 167

BROOKLYN NY 11223

Home Phone:

Mobile Phone: 818 489 9411

Email:

awetuk01@gmail.com

Αn	imal Details	<u> </u>		•		
	Animal ID	Name	Туре	Mixed	Color(1)	Color(2)
1	176452	Veillee	Dog	Yes	Black Brown	
•	Gender	Spayed / Neutered	Age	Incoming Date	License fee	
	Female	No	3 Years	6-Jul-2023		

Reunification Details:

Item

Amount

Products / Services:		÷	
Product / Service	Date	Quantity	Price Each
Microchip Implantation		1	\$0.00
Microchip Implantation		1	\$0.00
Bordetella Vaccine		1	\$15.00
		1	\$15.00
DA2PP Vaccine		1 .	\$12,00
Dewormer Treatment	•	1	\$30.00
Medical Exam		· .	\$34.00
NYC Dog Licence, unaltered [LICU]		1	\$15.00
Rabies Vaccine		1	\$3.00
Restoration/Redemption Fee		1	·
Total p	roducts / services fee included	in payment details below:	\$124.00

Payment Details:	
	Amount
Fee	\$0.00
Reunification	\$0.00
Dog License	Amount Paid \$0.00

Notes:

Entered By:456 991311 Printed By:456 991311 Printed On:Jul 12 2023 10:10AM

Reunification Agreement:

REUNIFICATION CONTRACT

Filed 06/24/24

Page 15 of 20

To Animal Details

To Kennel Card

Main Search Page

Switch to Current Address



Agency Receipt

326 East 110th Street New York NY 10029 212-788-4000

Person	Details

Person ID: 5951 Receipt #: 285399 Receipt Date: 5/25/2024

Person Name:

Police 52nd Precinct Police 52nd Precinct

Person Address:

3016 Webster Avenue Bronx NY 10467

Home Phone:

Mobile Phone:

718 220 5811

Email:

Identification Type:

ID Number:

Animal Details		:			
Animal ID	Name	Туре	Mixed	Color(1)	Color(2)
1 153814	Veillee	Dog	Yes	Black	Tan
	Spayed / Neutered	Age	Primary Microchip #	Rabies Tag	Date In / Found
Female	· · ·	3 Years 8 Months 3 Weeks (approx)	985113005559199	23-278818	25-May-2024

Payment Details:	•	•
Fee		Amount
	Amount Paid	1 \$0.00
		74

Notes:

Jurisdiction: Bronx

Entered By:1582 992296 Printed By:1582 992296 Printed On:May 25 2024 9:47PM Entered By User ID:1582

Conditions:

ACC's Surrender Prevention program can help you keep your pet! This program can provide you with information about free or low-cost veterinary care, pet food, behavior training, and more. Would you like to speak with an Admissions Counselor for more information? ____YES ____NO

PLEASE CONSIDER CAREFULLY

ANIMALS SURRENDERED TO ACC ARE CAREFULLY EVALUATED BASED ON AVAILABLE MEDICAL AND BEHAVIOR INFORMATION FOR ADOPTION, TRANSFER TO A RESCUE PARTNER, OR EUTHANASIA (HUMANELY PUT TO DEATH) AT THE SOLE DISCRETION OF ACC.

In consideration of Animal Care Centers of New York City ("ACC") accepting the animal described herein ("this animal"), I understand and agree as follows (please initial each section):

ACC does not guarantee that this animal will be adopted by a member of the public or transferred to a rescue partner. I understand that the length of time the animal may be held and the outcome, including adoption or humane euthanasia, is solely ACC's decision.

ACC may require that questions or other requests regarding the outcome of this animal be made in writing.

If this animal has bitten a person or animal, I will inform ACC.



2336 Linden Boulevard Brooklyn NV 1208 212-788-4000

Vet Treatment History

Owner Details

Akaniyene Etuk 1923 McDonald Avenue APT 167 BROOKLYN NY 11223

818 485 9411 818 485 9411

Animal Details

Name: Veilee Type: Dog Mixed: Yes

Color(1): Unknown (update later)

Gender: Female

Spayed / Neutered: Unknown

Age: 10 Months

This is to confirm that our records show that the animal described above has had the following vaccinations and treatments administered:

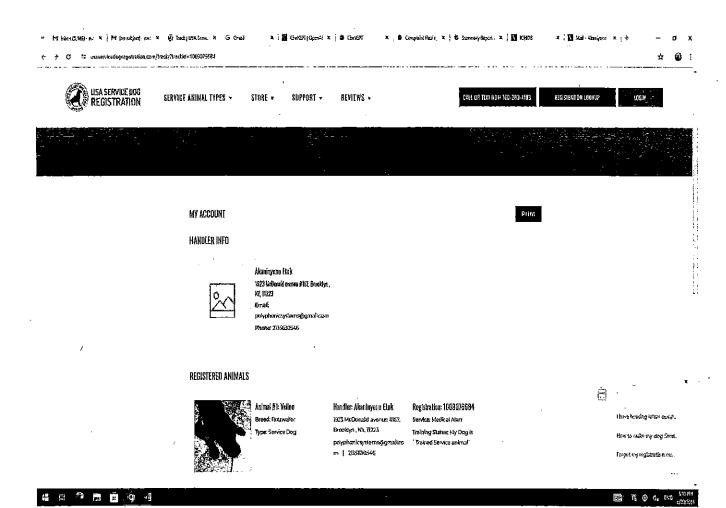
Vet Treatment Type Date Given	Type	Expiration Date Route Of Admin	Result Vet	License #
1 Rables Vaccine 22-Oct-2022	Killed		VET-P 991234	NY-010887
est ex			A STATE OF THE STA	
Vet Treatment Type		Due	Date.	, ,
1 Katies Vaccine		22-0	ct-2023	
وط الام				,, · · ·

Vet Signature:

Dr. Michelle Lugones

Date: 10/22/2022 1:19:00 PM





Certificate #: U-000010018-F

Page 1 of 2



BRONX CRIMINAL COURT

265 E 161 Street, Bronx, NY 10451

Non-Public Version

Court ORI: NY062033J

The People of the State of New York vs. Akaniyene W. Etuk	Certificate of Disposition Docket Number: CR-020431-23BX		
	CJTN: NYSID:	70425074M 16037193M	
Defendant DOB: 01/08/1977	Arrest Date: 08/30/2023	Arraignment Date: 09/19/2023	

THIS IS TO CERTIFY that the undersigned has examined the files of the Bronx Criminal Court concerning the above entitled

matter and finds the following:

matter and finds the following.				الانصاف المال
Count #	Charge	Charge Weight	Disposition	Disposition Date
1	PL 205.30 AM Resisting Arrest **SEALED 160.50**	AM	Dismissed (Speedy Trial (CPL 170.30 (1)(e)), Sealed 160.50)	01/03/2024
2	PL 140.10 0A BM Crim Trespass 3rd:Enclsd Prop **SEALED 160.50**	вм	Dismissed (Speedy Trial (CPL 170.30 (1)(e)), Sealed 160.50)	01/03/2024
3	PL 140.05 V Trespass **SEALED 160.50**	٧	Dismissed (Speedy Trial (CPL 170.30 (1)(e)), Sealed 160.50)	01/03/2024
4	PL 240:20 01 V Dis/Con:Fight/Violent Behavior **SEALED 160.50**	V	Dismissed (Speedy Trial (CPL 170.30 (1)(e)), Sealed 160.50)	01/03/2024

Charge Weight Key: I=Infraction; V=Violation; AM, BM=Class Misdemeanor; UM=Unclassified Misdemeanor; AF, BF, CF, DF, EF=Class Felony

Dated: January 19, 2024

Chief Clerk/Clerk of the Court

CAUTION: THIS DOCUMENT IS NOT OFFICIAL UNLESS EMBOSSED WITH THE COURT SEAL

All marijuana convictions under PL 221.05, PL 221.10, PL 221.15, PL 221.20, PL 221.35 or PL 221.40 —including any appearing on this certificate of disposition are vacated, dismissed, sealed, and expunged. It is an unlawful discriminatory practice for any entity to make any inquiry about such an expunged conviction or to use such an expunged conviction adversely against an individual in any form of application or otherwise—unless specifically required or permitted to do so by statute. It shall be an unlawful discriminatory practice, unless specifically required or permitted by statute, for any person, agency, bureau, corporation or association, including the state and any political subdivision thereof, to make any inquiry about, whether in any form of application or otherwise, or to act upon adversely to the individual involved, any strest or criminal accusation of such individual not then pending against that individual which was followed by a termination of that criminal action or proceeding in favor of such individual, as defined in subdivision two of section 160.50 of the criminal procedure law, or by an order adjourning the criminal action in contemplation of dismissal, pursuant to section 170.55, 170.56, 210.46, 210.47, or 215.10 of the criminal procedure law, or by a youthful offender adjudication, as defined in subdivision one of section 720.35 of the criminal procedure law, or by a conviction for a violation sealed pursuant to section 160.55 of the criminal procedure law or by a conviction which is sealed pursuant to section 160.59 or 160.58 of the criminal procedure law, in connection with the licensing, housing, employment, including volunteer positions, or providing of credit or insurance to such individual; provided, further, that no person shall be required to divulge information pertaining to any arrest or criminal accusation of such individual not then pending against that individual which was followed by a termination of that criminal action or proceeding in favor of such individual, as defined in subdivision two of section 160.50 of the criminal procedure law, or by an order adjourning the criminal action in contemplation of dismissal, pursuant to section 170.55 or 170.56, 210.46, 210.47 or 2)5.10 of the criminal procedure law, or by a youthful offender adjudication, as defined in subdivision one of section 720.35 of the criminal procedure law, or by a conviction for a violation scaled pursuant to section 160.55 of the criminal procedure law, or by a conviction which is sealed pursuant to section 160.58 or 160.59 of the criminal procedure law. An individual required or requested to provide information in violation of this subdivision may respond as if the arrest, criminal accusation, or disposition of such arrest or criminal accusation did not occur. The provisions of this subdivision shall not apply to the licensing activities of governmental bodies in relation to the regulation of guns, firearms and other deadly weapons or in relation to an application for employment as a police officer or peace officer as those torms are defined in subdivisions thirty-three and thirty-four of section 1.20 of the criminal procedure law; provided further that the provisions of this subdivision shall not apply to an application for employment or membership in any law enforcement agency with respect to any arrest or criminal accusation which was followed by a youthful offender adjudication, as defined in subdivision one of section 720.35 of the criminal procedure law, or by a conviction for a violation sealed pursuant to section 160.55 of the criminal procedure law, or by a conviction which is sealed pursuant to section 160.58 or 160.59 of the criminal procedure law. For purposes of this subdivision, an action which has been adjourned in contemplation of dismissal, pursuant to section 170.55 or 170.56, 210.46, 210.47 or 215.10 of the criminal procedure law, shall not be considered a pending action, unless the order to adjourn in contemplation of dismissal is revoked and the case is restored to the calendar for further prosecution. [Executive Law 296(16)] Charges may not be the same as the original arrest charges.

Document 1 Filed 06/24/24

Case 1:24-cv-04962-GHW-SDA

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V. PLAINTIFF'S CERTIFICATION AND WARNINGS

By signing below, I certify to the best of my knowledge, information, and belief that: (1) the complaint is not being presented for an improper purpose (such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation); (2) the claims are supported by existing law or by a nonfrivolous argument to change existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Federal Rule of Civil Procedure 11.

I agree to notify the Clerk's Office in writing of any changes to my mailing address. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Each Plaintiff must sign and date the complaint. Attach additional pages if necessary. If seeking to

proceed without prepayment of fe	es, each plaintiff i	must also submit ap	IPP appli cation .	
/ /		/_	Alle The	
14/24/2024		AMA	WANDU	
Dated	-	Plaintiff's Signatur	e	
)	15.6		
AKANIYENE	ω	CINF		
	ddle Initial	Last Name		
2404 ATLANTIC	ANENUE	= #04	•	
Street Address				
Brookeyn	N	\checkmark	11233	
County, City	State		Zip Code	
(218)485 -941 (\$129)6	76-0970	awetyto	001@gma	11-Com
Telephone Number		Email Address (if a	vailable)	

I have read the Pro Se (Nonprisoner) Consent to Receive Documents Electronically: ☐ Yes ☐ No

If you do consent to receive documents electronically, submit the completed form with your complaint. If you do not consent, please do not attach the form.